

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

CUSTOMS AND TAX ADMINISTRATION  
OF THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX  
REFUND SCHEME LITIGATION

MASTER DOCKET

18-md-2865 (LAK)

This document relates to: 18-cv-09797,  
18-cv-09836, 18-cv-09837, 18-cv-09838,  
18-cv-09839, 18-cv-09840, 18-cv-09841

**DECLARATION OF BRANDON R. DILLMAN**

I, Brandon R. Dillman, depose and say as follows:

1. I am an associate of the law firm K&L Gates LLP.
2. K&L Gates LLP is counsel for Defendants / Plaintiffs-in-Counterclaims in the above-captioned related actions.
3. I have personal knowledge of the matters discussed in this declaration.
4. Attached hereto as Exhibit 1 is a true and correct copy of the complaint filed by SKAT against DW Construction, Inc. Retirement Plan and Stacey Kaminer.
5. Attached hereto as Exhibit 2 is a true and correct copy of the answer of DW Construction, Inc. Retirement Plan and Stacey Kaminer and counterclaims against SKAT filed by DW Construction, Inc. Retirement Plan.

I, Brandon R. Dillman, hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: September 10, 2019

  
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Brandon R. Dillman